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**IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

ADMIRAL INSURANCE COMPANY,

Plaintiff,

vs.

KABUL, INC. d/b/a FASTRIP PWC  
 RENTALS, KABUL, INC. d/b/a FASTRIP  
 FOOD STORE,

Defendants.

Case No.:

2:24-cv-02060-GMN-MDC

KABUL, INC., dba FASTRIP PWC and  
 FASTRIP FOOD STORE,

Counter/Cross/Third Party

Claimant,

v.

ADMIRAL INSURANCE COMPANY,  
 GREGG EIDSNESS FARM BUREAU  
 FINANCIAL SERVICES, NBS Insurance  
 Agency, Inc. aka NATIONWIDE  
 BROKERAGE SOLUTIONS, RT  
 SPECIALTY, RSG SPECIALTY, LLC, RYAN  
 SPECIALTY, LLC, ERIK W. FOX, WOLFE  
 & WYMAN, LLP, KEVIN R.  
 STOLWORTHY, ARMSTRONG  
 TEASDALE, LLP, and DOES I through X,  
 inclusive; and ROE CORPORATIONS I  
 through X, inclusive, Counter/Cross/Third  
 Party Defendants.

KABUL, INC.,

Plaintiff,

v.

ADMIRAL INSURANCE COMPANY,  
GREGG EIDSNESS FARM BUREAU  
FINANCIAL SERVICES, NBS Insurance  
Agency, Inc. aka NATIONWIDE  
BROKERAGE SOLUTIONS, RT  
SPECIALTY, RSG SPECIALTY, LLC, RYAN  
SPECIALTY, LLC, ERIK W. FOX, WOLFE  
& WYMAN, LLP, KEVIN R.  
STOLWORTHY, ARMSTRONG  
TEASDALE, LLP, DOES I through X,  
inclusive; and ROE CORPORATIONS I  
through X, inclusive,

Defendants.

Consolidated with

2:25-cv-01343-GMN-MDC

**STIPULATION AND PROPOSED ORDER  
TO EXTEND TIME FOR RESPONSES AND REPLIES**

The parties hereto, by and through their respective counsel, hereby stipulate and agree, subject to this Court's approval, to extend the time for the parties to file Responses and Replies in the case as specified below.

In the instant case, Defendant/Counter/Cross/Third Party Claimant Kabul, Inc. ("Kabul") filed its Answer and Counter/Cross/Third Party Complaint on June 10, 2025. (ECF No. 33) On September 12, 2025, Specially Appearing Third Party Defendants RT Specialty and RSG Specialty, LLC filed a Motion to Dismiss for Lack of Jurisdiction and Failure to State a Claim. (ECF No. 90) Additionally, on September 12, 2025, Specially Appearing Third Party Defendant Ryan Specialty, LLC filed a Motion to Dismiss for Lack of Jurisdiction and a Joinder to RSG's Motion to Dismiss for Failure to State a Claim. (ECF No. 91) The Responses to those two Motions is currently due September 26, 2025. This is the first request to extend the deadline for the Responses.

On September 23, 2025, an Order was issued consolidating this lead case (2:24-cv-02060-GMN-MDC) with another case that was initiated in Nevada State Court and removed to this Court (2:25-cv-01343-GMN-MDC). In the latter case, the Kabul's Complaint was originally filed on June 10, 2024 and the Petition for Removal was filed on July 23, 2025 (ECF No. 1 in 2:25-cv-01343-GMN-MDC). Also in that case, on September 12, 2025, Specially Appearing Defendants RT Specialty and RSG Specialty, LLC filed a Motion to Dismiss for Lack of Jurisdiction and Failure to State a Claim. (ECF No. 60) Additionally, on September 12, 2025, Specially Appearing Defendant Ryan Specialty, LLC filed a Motion to Dismiss for Lack of Jurisdiction and for Failure to State a Claim. (ECF No. 61) The Responses to those two Motions is currently due September 26, 2025. This is the first request to extend the deadline for the Responses.

WHEREAS the parties hereto have met and conferred regarding extending deadlines related to the briefing related to the pending Motions in the now consolidated case. The parties assert that good cause exists based upon scheduling conflicts. Counsel for Kabul has had out of state visitors and has been out of the office. Additionally, lead counsel is scheduled to be out of town next week. Additionally, counsel for RT Specialty, RSG Specialty and Ryan Specialty will be out of town the following week. Also, following the recent consolidation, the parties intend to explore ways that the case may be streamlined and made more efficient. Therefore, at this time, good cause exists to extend the time for the Responses to the Motions as well as the Replies.

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1 IT IS HEREBY STIPULATED by and among counsel for Kabul and counsel for RT  
2 Specialty, RSG Specialty and Ryan Specialty that the deadlines for Kabul's Response to Specially  
3 Appearing Third Party Defendants RT Specialty and RSG Specialty, LLC filed a Motion to  
4 Dismiss for Lack of Jurisdiction and Failure to State a Claim. (ECF No. 90) and Specially  
5 Appearing Third Party Defendant Ryan Specialty, LLC filed a Motion to Dismiss for Lack of  
6 Jurisdiction and a Joinder to RSG's Motion to Dismiss for Failure to State a Claim. (ECF No. 91)  
7 shall be extended to October 10, 2025.  
8

9 Further, IT IS HEREBY STIPULATED by and among counsel for Kabul and counsel for  
10 RT Specialty, RSG Specialty and Ryan Specialty that the deadlines for Kabul's Response to  
11 Specially Appearing Defendants RT Specialty and RSG Specialty, LLC filed a Motion to Dismiss  
12 for Lack of Jurisdiction and Failure to State a Claim. (ECF No. 60 in 2:25-cv-01343)  
13 Additionally, on September 12, 2025, Specially Appearing Defendant Ryan Specialty, LLC filed  
14 a Motion to Dismiss for Lack of Jurisdiction and for Failure to State a Claim. (ECF No. 61 in  
15 ECF No. 60 in 2:25-cv-01343 ) shall be extended to October 10, 2025.  
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17 Further, IT IS HEREBY STIPULATED by and among counsel for Kabul and counsel for  
18 RT Specialty, RSG Specialty and Ryan Specialty that the deadlines for any Replies in support of  
19 any of above-stated Motions (ECF Nos. 90, 91; 60, 61 in 2:25-cv-01343) by Specially Appearing  
20 Defendants RT Specialty, RSG Specialty, LLC, and Ryan Specialty, LLC shall be extended to  
21 October 27, 2025.  
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1 The parties further agree that RT Specialty, Ryan Specialty, LLC and RSG Specialty LLC  
2 expressly preserve and do not waive the jurisdictional defenses asserted in the above motions by  
3 submitting this stipulation.

4 IT IS SO STIPULATED.

5 Dated this 26th day of September, 2025.

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7 CHRISTENSEN LAW OFFICES, LLC

8 BY: /s/Thomas Christensen

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14 HALL PRANGLE, LLC

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21  
22 IT IS SO ORDERED:

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24   
25 UNITED STATES DISTRICT JUDGE

26 DATED: September 29, 2025